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22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)
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JPMORGAN CHASE BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:20-cv-02188-APG-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND [ECF No. 10] AND MOTION
FOR FEES AND COSTS [ECF No. 11]**

(Second Request)

1 Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff JPMorgan
2 Chase Bank N.A.’s (“JPMorgan”) (collectively, the “Parties”), by and through their counsel of
3 record, hereby stipulate and agree as follows:

- 4 1. On December 1, 2020, JPMorgan filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-20-825633-C [ECF No. 1-1];
- 6 2. On December 1, 2020, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
- 7 3. On December 31, 2020, JPMorgan filed a Motion for Remand [ECF No. 10];
- 8 4. On December 31, 2020, JPMorgan filed a Motion for Costs and Fees [ECF No. 11];
- 9 5. Fidelity’s deadline to respond to JPMorgan’s Motion for Remand and Motion for
10 Costs and Fees is currently January 28, 2021;
- 11 6. Fidelity’s counsel is requesting an extension until Friday, February 12, 2021, to file its
12 response to the pending Motion for Remand and Motion for Costs and Fees;
- 13 7. Fidelity requests a brief extension of time to respond to the Motion for Remand and
14 Motion for Costs and Fees to afford Fidelity additional time to respond to the legal
15 arguments set forth in JPMorgan’s motions;
- 16 8. JPMorgan does not oppose the requested extension;
- 17 9. This is the second request for an extension which is made in good faith and not for
18 purposes of delay;

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1 **IT IS SO STIPULATED** that Fidelity's deadline to respond to JPMorgan's Motion for
2 Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended through
3 and including February 12, 2021.

4
5 Dated: January 22, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
8 Attorneys for Defendant FIDELITY
9 NATIONAL TITLE INSURANCE
COMPANY

10
11 Dated: January 22, 2021

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
13 Attorneys for Defendant FIDELITY
14 NATIONAL TITLE INSURANCE
COMPANY

15 Dated: January 22, 2021

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Lindsay D. Robbins
LINDSAY D. ROBBINS
17 Attorneys for Plaintiff JPMORGAN CHASE
18 BANK, N.A.

19 **IT IS SO ORDERED:**

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21 Dated: January 25, 2021

22 By: 
UNITED STATES JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

